

## **REMARKS**

Please reconsider the application in view of the following remarks.

### **I. Disposition of Claims**

Claims 1-10 are pending in the present application. Claims 1, 4, and 6-10 are independent claims. The remaining claims depend, directly or indirectly, from claims 1 and 4.

### **II. Rejection(s) Under 35 U.S.C § 103**

Claims 1-10 of the present application were rejected under 35 U.S.C. § 103(a) as being unpatentable over of U.S. Patent No. 6,384,926 issued to Mochizuki (hereinafter "Mochizuki") in view of U.S. Patent No. 6,453,127 issued to Wood *et al.* (hereinafter "Wood"). For the reasons set forth below, this rejection is respectfully traversed.

#### *The Present Invention*

Independent claims 1, 4, and 6-10 relate to a printer, a printing method, a program for printing, or a print system. For example, the printer in the present invention includes a memory for storing a program and/or data, a processor for executing a program; and a print engine for executing printing on a print record medium. The processor of the printer receives from a computer a print request, which includes a request to a peripheral device to acquire print data. The processor also sends the acquisition request to the peripheral device and causes the print engine to print on the basis of the print data sent from the peripheral device in response to the acquisition request.

Figure 4 shows a sequence diagram, which illustrates an example operation of the

printer, in accordance with one embodiment of the present invention. In Figure 4, the printer serves an intermediary between the client computer and the peripheral device (for example, a server). In other words, the printer of the present invention communicates directly with the client computer and server, however, the peripheral device and the client computer need not communicate directly with one another.

*The Present Invention v. Mochizuki & Wood*

The combination of Mochizuki and Wood fails to teach or suggest the printer of the present invention. Particularly, Mochizuki and Wood fail to teach or suggest a printer that “receives from a computer a print request, including a request to a peripheral device to acquire print data; sends the acquisition request to the peripheral; and causes the print engine to print on the basis of the print data from the peripheral device in response to the acquisition request,” as recited in claim 1.

In one aspect, Mochizuki fails to show the operation of the printer of the present invention. In other words, Mochizuki fails to show (1) a printer that receives a print request from a computer; (2) a printer that sends the acquisition request to a peripheral device; and (3) a printer that prints in response to the acquisition request. In contrast, Mochizuki shows that a *print server* operates as the intermediary between the client computer and the printer as shown in Figure 4, for example. Mochizuki states, “[i]n such a network system, the print server 12 accepts a print request issued from the client 11 and then [the print server 12] operates the printer 13. The printer 13 executes [sic] the print request from the client 11,” (col. 4, ll. 60-64). In other words, the print server, rather than the printer, receives the print request from a computer and the print server sends the print request to a printer.

In another aspect, as acknowledged by the Examiner, Mochizuki fails to show “a print request, including a request to a peripheral device to acquire print data,” as recited in claim 1. This is not surprising, because the print server acts as the intermediary instead of the printer in Mochizuki. In other words, when the present invention routes a print request, the printer first receives the print request and specifies a peripheral device to acquire data there from. For example, the printer of the present invention may print data from a variety of peripheral devices, *e.g.*, a scanner, digital camera, or server, *etc.* However, the peripheral device of Mochizuki, *i.e.*, the print server, first receives the print request, so there is no need to additionally specify the peripheral device, because the print request originates from the peripheral device.

Mochizuki fails to teach all of the elements of the claimed invention. Further, Wood fails to show that which Mochizuki lacks with respect to claim 1. In fact, Wood merely teaches a printer/copier system that allows a user to query the system remotely, to check on the status of a print job. Accordingly, Mochizuki and Wood, whether considered separately or in combination, cannot render the invention as recited in claim 1 obvious.

Moreover, Mochizuki actually teaches away from using a request to a peripheral device. As previously mentioned, in Mochizuki, the print request is initially sent to the peripheral device, namely, the print server. Therefore, there is no motivation provided within Mochizuki to include an additional request to a peripheral device. Because Mochizuki teaches away from using a request to a peripheral device, the reference cannot be properly used to render the invention recited in claim 1 obvious.


Because Mochizuki and Wood fail to disclose all of the elements of claim 1, and, in fact, Mochizuki teaches away from the present invention as recited in claim 1, claim 1 is patentable over Mochizuki and Wood, whether considered separately or in combination. Claims 2, 3, and 5, being dependent on claim 1, are also patentable for at least the same reasons. Additionally, the above remarks apply similarly to claims 4 and 6-10, and thus, these claims are also patentable for at least the same reasons. Accordingly, withdrawal of the §103 rejection is respectfully requested.

### III. Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 04783.012001).

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Respectfully submitted,

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